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County of Inyo

Southeast Area Citizen Advisory Committee

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May 31, 2001

Jane R. Summerson
Yucca Mountain Site Characterization Office
Office of Civilian Radioactive Waste Management
U.S. Department of Energy
P.O. Box 30307, Mail Stop 010
North Las Vegas, Nevada
89036-0307

RE: ***Inyo County SOUTHEAST AREA CITIZEN ADVISORY COMMITTEE Comments on the Supplement to the Draft Environmental Impact Statement for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada.***

Dear Ms. Summerson,

The County of Inyo, State of California, is an Affected Unit of Local Government under the Nuclear Waste Policy Act of 1982, as amended. The Inyo County Board of Supervisors established, in 1998, a citizen advisory committee, the **Southeast Area Citizen Advisory Committee.** One of the tasks assigned this Committee is to review and advise the Board on issues relating to the proposed Yucca Mountain Nuclear Waste Repository. The Committee submits the following two-part response to the U.S. Department of Energy's (DOE's) *Supplement to the Draft Environmental Impact Statement for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada* (SEIS). The first section are comments from Committee member Jennifer Viereck, the second section includes comments from Committee Chair Jann Rucquoi. These comments have been endorsed by our committee.

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[1] We are extremely appreciative of the enormous volume of research and work that has gone into the further evolution of the repository design since the release of the first Draft EIS in 1999. It seems clear that the DOE has attempted to be responsive to some of the criticisms of that original document. However, several unresolved issues come immediately to the forefront of our concerns:

1... a. If the design is still so totally in a state of fluctuation. or "evolution", why are we
2..., 1 cont being asked to respond to it, and why is the EIS process moving forward? There are not clear definitions of the design put forward for the Proposed Action, nor are there clear alternatives for comparison. There are a number of variables and parameters that can be combined in different ways like a soup recipe, all still in a very exploratory
2 cont stage, but no clear conclusions for us to evaluate. This report and this process is completely premature. We don't believe that this premature and incomplete approach to the EIS process is even legal, let alone ethical or responsible to the taxpayers or residents of this region.

3 b. The time period allowed for hearings and responses to this Supplement, with its enormous but rather sketchily outlined new scheme, 45 days, is completely inadequate. We are not radiation professionals- we are juggling jobs and families, in addition to trying to review this technical material that has tremendous implications to our lives in the future. Since the Radiation Regulations for the Proposed Repository have not been decided, therefore delaying indefinitely the final EIS report and the Site Recommendation process, there seems to be no logical reason for this rushed process. In addition, many people should have the right to review and comment on these broad changes to a huge national policy.

4 c. This Supplement does not take into account a number of serious discrepancies in the original document that have been pointed out about this region, such as population and employment figures in Nye county. Therefore, how can the dose calculations be accurate?

d. This supplement spells out, in extremely outline form, a number of entirely new facilities and waste handling processes that have enormous implications: a cooling pool, an above ground storage facility that would operate for up to 50 years, mixing and repackaging waste, etc.

5 e. If storing waste on the surface for the next 50 years is now part of the Yucca Mountain plan, why is it not being stored on site, thus eliminating transportation dangers to the public and to residents of this area, while the DOE figures out a truly
6 safe solution? Is exposing our region to this incomplete plan merely being done to avoid litigation from nuclear utility companies?

7... f. The margin for human error, in record keeping alone, seems enormous. Potentially deadly problems that have happened at nuclear reactor sites already, such as cranes getting jammed while lifting rods out of pools, lids being dropped or gases threatening explosion, would be greatly magnified. The analysis of the potential impacts of these new facilities is very incomplete. The accident scenario for the

7 cont Waste Handling Facility doesn't appear to include the storage pool or the rods that would be in it. It seems highly unlikely that this above ground facility could even be licensed by the NRC independently, if it were held to the same criteria as other sites under consideration.

8 g. The only thing that does seem completely clear to us from this document is that it is completely impossible for this project to meet its original mission, "to isolate high-level nuclear waste from the biosphere". On page S-7, it states that the mean annual dose will continue to rise after the arbitrary 10,000 year licensing period, that the peak dosage could range from 120 millirems to 260 millirems, right up the road at the freeway junction, some 550, 000 years from now. Has any other federal project, let alone one that is currently estimated to cost $56 billion dollars, ever guaranteed its own failure, right from the start?

9 h. Lastly, we would ask the DOE to take into account a recent study by the US Geological Survey about storm drainage in our area. Apparently the already radioactive effluent from the Nevada Test Site, and potentially contaminated effluent from the Yucca Mountain area, runs directly into our Amargosa River, impacting Death Valley Junction, Shoshone, Tecopa, the Timbisha Shoshone Tribe, and the 1.4 million visitors each year to Death Valley National Park. These above ground nuclear storage and handling facilities would directly impact surface water, unlike the original deep repository design. We are extremely concerned about much speedier contamination of our watershed than previously thought.

10 **[2]** The EIS lacks treatment of cumulative effects from both Yucca Mountain and the Nevada Test Site. Surface water from both these projects comes into the Amargosa Valley and beyond, all the way to Death Valley. The new design requires aboveground storage of large quantities of spent nuclear fuel in pools and in casks. This surface storage is being proposed to take place over a period of decades – these facilities themselves are obviously a risk to surface water. There is a real possibility of earthquake damage to the site. Tecopa is considered Seismic Zone 3, and Yucca Mountain is considered potentially more active than Tecopa.

11 Based on DOE's recently released cost report, on-site dry cask storage would cost under $10 billion. The Yucca Mountain project has to date spent $7 billion, and the projected cost to complete the project is estimated ay $49 billion. It seems worthwhile to examine this situation based on cost effectiveness. On-site storage would obviate the risks of required transportation of high-level nuclear waste over long distances and on many problematic roads, such as California State Route 127 which is a possible transport route for waste to Yucca Mountain.

Andrew Remus, Staff
On behalf of the Inyo County Southeast Area Citizen Advisory Committee